

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOLENE FURDEK, and JONATHAN
RYAN, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation, and APPLE INC., a California
corporation,

Defendants.

Case No. 2:22-cv-01599-KKE

**STIPULATED MOTION AND ORDER
SETTING PROCESS FOR SEALING
CONFIDENTIAL MATERIALS**

1 The Parties and their respective counsel stipulate and request that the Court order as
2 follows:

3 1. On May 14, 2025, Plaintiffs filed under provisional seal Plaintiffs' Motion for Class
4 Certification (Dkt. 218). Plaintiffs attached to and discussed in their Motion for Class Certification
5 certain documents Amazon and Apple had designated Confidential under the Protective Order in
6 this case.

7 2. Amazon and Apple intend to request for the Court to maintain sealing for materials
8 submitted by Plaintiffs, under the procedure set forth in LCR 5(g)(1)(A).

9 3. The Parties anticipate that further briefing on Plaintiffs' Motion for Class
10 Certification may likewise reference Amazon and Apple's confidential materials.

11 4. In the interest of efficiency and judicial economy, the Parties stipulate and jointly
12 propose that Amazon and Apple submit a single joint brief to support the sealing of any materials
13 for which they intend to seek continued sealing in connection with the briefing on Plaintiffs'
14 Motion for Class Certification, rather than separate sealing papers for each brief filed. Amazon
15 and Apple's consolidated response will clearly identify each docket entry to which it pertains.

16 5. Pursuant to LCR 5(g)(2), Plaintiffs, Amazon and Apple will provisionally file
17 under seal those portions of any briefing, declarations, exhibits, and all other evidence which may
18 contain material designated Confidential or Highly Confidential.

19 6. Following the completion of briefing, the Parties will meet and confer regarding
20 sealing. Amazon and Apple's response regarding sealing, and any proposed redactions, will be
21 due four weeks after briefing on Plaintiffs' Motion for Class Certification is completed.

1 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

2
3 DATED this 9th day of June, 2025.

Respectfully submitted,

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ORDER

Pursuant to the Parties' Stipulation, IT IS SO ORDERED.

Dated: June 10, 2025.

A handwritten signature in black ink, reading "Kimberly K. Evanson". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Kimberly K. Evanson
United States District Judge